International ("MGM") (collectively, the "Parties") respectfully stipulate MGM's time to STIPULATION TO EXTEND TIME TO FILE DEFENDANT'S RESPONSE TO COMPLAINT

28

CASE NO. NO. 2:23-CV-01577

| 1 | | |
|----|--|--|
| 2 | | |
| 3 | | |
| 4 | | |
| 5 | | |
| 6 | | |
| 7 | | |
| 8 | | |
| 9 | | |
| 10 | | |
| 11 | | |
| 12 | | |
| 13 | | |
| 14 | | |
| 15 | | |
| 16 | | |
| 17 | | |
| 18 | | |
| 19 | | |
| 20 | | |
| 21 | | |
| 22 | | |
| 23 | | |
| 24 | | |

| respond to the Complaint be extended from the current deadline of December 12, 2023 to |
|--------------------------------------------------------------------------------------------|
| and including January 11, 2024. This is the second stipulation for an extension of time to |
| file MGM's responsive pleading. The court previously granted an extension on November |
| 14, 2023. ECF No. 19. |

Good cause exists to enlarge the time for MGM to respond to the Complaint. There are currently ten other related actions filed against MGM pending in the District of Nevada (the "Related Actions"). See Kirwan v. MGM Resorts Int'l, No. 2:23-cv-01481 (D. Nev.); Zussman v. VICI Properties 1 LLC, et al., No. 2:23-cv-01537 (D. Nev.); Lackey v. MGM Resorts Int'l, No. 2:23-cv-01549 (D. Nev.); Pircio v. MGM Resorts Int'l, No. 2:23-cv-01550 (D. Nev.); Owens v. MGM Resorts Int'l, No. 2:23-cv-01480 (D. Nev.); Rundell v. MGM Resorts Int'l, No. 2:23-cv-01698 (D. Nev.); Bezak v. MGM Resorts Int'l, No. 2:23-cv-01719 (D. Nev.) Albrigo v. MGM Resorts Int'l, No. 2:23-cv-1981 (D. Nev.); Zari v. MGM Resorts Int'l, No. 2:23-cv-01777 (D. Nev.); Manson v. MGM Resorts Int'l, No. 2:23-cv-01826. One other action is pending in the District of New Jersey. Lassoff v. MGM Resorts Int'l, No. 1:23-cv-20419.

The parties in the Related Actions are actively preparing a joint motion to consolidate the Related Actions. As such, additional time is required to permit time to meet and confer with the various parties to the Related Actions and finalize the joint motion.

The Parties' request is made in good faith to enable the parties to finalize the joint motion for consolidation and conserve judicial and party resources. Moreover, this case is in its infancy, and this request will not prejudice any party.

WHEREAS the Parties respectfully request that MGM shall have until January 11, 2024 to answer, move, or otherwise respond to the Complaint.

25 Dated: December 11, 2023

Respectfully submitted,

s/ Leon Greenberg

26

LEON GREENBERG PC

27

State Bar Number: 8094

| 1 2 3 4 | IT IS SO ORDERED. | 1811 South Rainbow Boulevard # 210 Las Vegas, Nevada 89146 Telephone: (702) 383-6085 Facsimile: (702) 385-1827 ranni@overtimelaw.com |
|------------------|----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| 5 | Cam Ferenbach United States Magistrate Judge | RACHELE R. BYRD (pro hac vice) WOLF HALDENSTEIN ADLER |
| 6 | 12-12-2023 | FREEMAN & HERZ LLP 750 B Street, Suite 1820 |
| 7 | DATED | San Diego, CA 92101 |
| 8 | | Telephone: (619) 239-4599 Facsimile: (619) 234-4599 byrd@whafh.com |
| 9 | | ION TOSTRUD (h |
| 10 | | JON TOSTRUD (<i>pro hac vice</i>) ANTHONY CARTER (<i>pro hac vice</i>) |
| 11 | | TOSTRUD LAW GROUP, PC 1925 Century Park East, Suite 2100 |
| 12 | | Los Angeles, CA 90067 |
| 13 | | Telephone: 310/278-2600 Facsimile: 310/278-2640 |
| 14 | | jtostrud@tostrudlaw.com |
| 15 | | acarter@tostrudlaw.com |
| 16 | | ERIK LANGELAND (pro hac vice) ERIK H. LANGELAND, P.C. |
| | | 733 Third Avenue, 16th Floor |
| 17 | | New York, N.Y. 10017 Telephone: (212) 354-6270 |
| 18 | | elangeland@langelandlaw.com |
| 19 | | Attorneys for Plaintiff and the Proposed |
| 20 | | Class |
| 21 | | / /T 111 P' |
| 22 | - | /s/ Todd L. Bice |
| 23 | | Todd L. Bice PISANELLI BICE, PLLC |
| 24 | | 400 S. 7th Street Suite 300 Las Vegas, NV 89101 |
| 25 | | Telephone: 702.214.2100 tlb@pisanellibice.com |
| 26 | | Angela C. Agrusa |
| 27 | | DLA PIPER LLP (US) 2000 Avenue of the Stars |
| 28 | | Suite 400 North Tower Los Angeles, CA 90067-4735 |
| | 1 | |

Telephone: 310.595.3000 angela.agrusa@us.dlapiper.com Attorneys for Defendant MGM Resorts International

Case 2:23-cv-01577-RFB-VCF Document 24 Filed 12/12/23 Page 4 of 4